

EXHIBIT 67
REDACTED

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VIA EMAIL

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Re: In re: Google Digital Advertising Antitrust Litigation, No. 1:21-md-03010 (PKC)

Dear Walter and Mark:

Contemporaneously with this letter, Google is making available a data production in response to Requests 20, 21, 22, 33, 54, 66, 243, 247, and 296 of Plaintiffs' First Requests for Production ("RFPs").

This is Google's third data production to Plaintiffs. On April 13, in response to RFPs 21, 33, 116, 159, and 243, Google made available to Plaintiffs both the Google Ad Manager Log-Level Bid Data Set ("GAM Data Set") that was previously provided to the U.S. Department of Justice ("DOJ") and the data that Google previously produced to the DOJ from its [REDACTED] [REDACTED]. On May 10, Google made available to Plaintiffs a sample of 100 events pertaining to each named Publisher Plaintiff from each of the 32 logs that were accessed to create the GAM Data Set, for April 5, 2023 (to the extent there are recorded events pertaining to a Publisher Plaintiff on such date).

The table below describes, by RFP, each responsive dataset that Google is producing today or has previously produced. These productions are consistent with the proposals made in Google's Feb. 27 Responses and Objections (with minor exceptions, noted below) and also include the additional fields that Google agreed to provide in response to Plaintiffs' requests. See April 20, 2023 email from Sam Sherman to Walter Noss and Mark Mao. With this production, Google will have produced a total of 116 terabytes of

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data in response to Plaintiffs' RFPs, and Google considers its responses to RFPs 20, 21, 22, 54, 66, 116, 159, 243, 247, and 296 to be substantially complete. As discussed during our May 22 meet-and-confer, Google anticipates making additional productions that will contain its responses to RFPs 239, 240, 244, 245, and 261.

RFP	Description of Responsive Data Production
20	<p>Separately for Google Ads and DV360 and for each year from January 2014 to December 2022 for Google Ads and from January 2016¹ to December 2022 for DV360, [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>(GOOG-AT-MDL-DATA-000508816 (folder: mdl_rfp_020_submission))</p>
21	<p>Data covering the period June 2018 to September 2022 from [REDACTED] set previously produced on April 13 as described in Daniel Bitton's April 17 letter (GOOG-AT-MDL-DATA-000000001; GOOG-AT-MDL-DATA-000066502), showing [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>(GOOG-AT-MDL-DATA-000508817 (folder: mdl_rfp_021_submission))</p> <p>Data covering the period from January 2014³ through December 2022, showing monthly totals of [REDACTED]</p>

¹² The geography is based on the region which the Google sales team managing the publisher account focuses on.³⁴ Throughout this letter, "user" refers to the individual person generating the impression by viewing a webpage. By contrast, "customer" refers to the entity using the ad tech tool.

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	<p>i [REDACTED]</p> <p>(GOOG-AT-MDL-DATA-000508818 (folder: mdl_rfp_021_submission))</p> <p>Data covering the period from January 2014 through December 2022, showing monthly total transaction value (i.e., gross revenue in the exchange auction⁵) for U.S. user web impressions transacted through</p> <ul style="list-style-type: none">● AdX and● Open Bidding. <p>(GOOG-AT-MDL-DATA-000508818 (folder: mdl_rfp_021_submission))</p>
22	<p>Data covering the period January 2014 to December 2022 for Google Ads and January 2016⁶ to December 2022 for DV360 sufficient to show the total monthly U.S. web display ad spend (based on customer billing address) through each of Google Ads and DV360, separately for AdX and for exchanges operated by firms other than Google.</p> <p>(GOOG-AT-MDL-DATA-000508819 (folder: mdl_rfp_022_submission))</p>
33	<p>Data, [REDACTED] previously produced on April 13 as described in Daniel Bitton's April 17 letter (GOOG-AT-MDL-DATA-000000001; GOOG-AT-MDL-DATA-000066502), showing for each month from June 2018 to September 2022,</p> <ul style="list-style-type: none">● [REDACTED], and● [REDACTED] (e.g., LPS, OPG). <p>(GOOG-AT-MDL-DATA-000508820 (folder: mdl_rfp_033_submission))</p> <ul style="list-style-type: none">● [REDACTED] <p>(GOOG-AT-MDL-DATA-000508821 (folder: mdl_rfp_033_submission))</p>
54	<p>Data showing, for each month from December 2016⁷ to December 2022,</p> <ul style="list-style-type: none">● [REDACTED]● [REDACTED] <p>(GOOG-AT-MDL-DATA-000508822 (folder: mdl_rfp_054_submission))</p>
66	<p>Data showing:</p> <ul style="list-style-type: none">● for each month from January 2014 to December 2022, total gross revenue from U.S. user

⁵ The “gross revenue” field in this data is net of any buyside fees, and gross of any sellside fees.

⁶ As noted in footnote 1 above, [REDACTED]

⁷ [REDACTED]

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	<p>web impressions transacted through AdX and Open Bidding (i.e., total AdX and Open Bidding revenue before Google's sell-side revenue share is applied); and (GOOG-AT-MDL-DATA-000508823 (folder: mdl_rfp_066_submission))</p> <ul style="list-style-type: none">for each month from February 2014 to December 2022, total Google Ad Manager ad-serving fees charged to all publishers worldwide. (GOOG-AT-MDL-DATA-000508824 (folder: mdl_rfp_066_submission))
116	<p>Google previously produced the GAM Data Set on April 13, as described in Daniel Bitton's April 17 letter.</p> <p>(GOOG-AT-MDL-DATA-000000002 to GOOG-AT-MDL-DATA-000066501)</p>
159	<p>Google previously produced the GAM Data Set on April 13, as described in Daniel Bitton's April 17 letter.</p> <p>(GOOG-AT-MDL-DATA-000000002 to GOOG-AT-MDL-DATA-000066501)</p>
243	<p>Google previously produced the GAM Data Set on April 13, as described in Daniel Bitton's April 17 letter.</p> <p>(GOOG-AT-MDL-DATA-000000002 to GOOG-AT-MDL-DATA-000066501)</p> <p>Google also previously produced [REDACTED] on April 13, as described in Daniel Bitton's April 17 letter.</p> <p>(GOOG-AT-MDL-DATA-000000001; GOOG-AT-MDL-DATA-000066502)</p> <p>For each month from January 2014 to December 2022, the following monthly data on web display transactions through Google Ads involving customers with U.S. billing addresses: (i) total impressions; (ii) total clicks; (iii) total amount paid by customers; and (iv) total amount paid to publishers (for AdX, AdSense, and YouTube transactions) or total amount paid to third-party exchanges. In addition, this Google Ads data will include [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>(GOOG-AT-MDL-DATA-000486626 to GOOG-AT-MDL-DATA-000488277 (folder: mdl_rfp_243_google_ads_submission))</p> <p>For each month from January 2016 to December 2022, the following monthly data on web display transactions through DV360 involving customers with U.S. billing addresses: (i) total impressions; (ii) total clicks; (iii) total media cost (i.e., the amount paid to an inventory source); (iv) total DV360 platform fees charged by Google; and (v) total fees paid to third parties. In addition, this DV360 data will include [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>(GOOG-AT-MDL-DATA-000488278 to GOOG-AT-MDL-DATA-000508815 (folder: mdl_rfp_243_dv360_submission))</p>

⁸ As noted in footnote 1 above, [REDACTED]

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For each month from January 2014 to December 2022, the following monthly data on web display transactions through AdX⁹ and Open Bidding involving U.S. users: (i) total impressions; (ii) total clicks; (iii) total gross revenue in the exchange auction; (iv) total amount paid to publishers; and (v) total fees charged by Google (separate from any share of gross revenue retained by Google). In addition, this AdX/Open Bidding data will include [REDACTED]

(GOOG-AT-MDL-DATA-000066537 to GOOG-AT-MDL-DATA-000482007 (folders:

- mdl_rfp_243_adx_submission;
- mdl_rfp_243_adx_crosswalk))

For each month from January 2014 to December 2022, the following monthly data on web¹⁰ display ads served through Google Ad Manager (excluding AdX, Open Bidding, and AdSense "backfill" from Google Ad Manager) involving U.S. users: (i) total impressions and (ii) total clicks. In addition, this Google Ad Manager data will include [REDACTED]

(GOOG-AT-MDL-DATA-000482008 to GOOG-AT-MDL-DATA-000482531 (folder: mdl_rfp_243_dfp_reservations_submission))

For each month from January 2015 to December 2022, the following monthly data on web¹² display ads served via AdSense "backfill" through Google Ad Manager involving U.S. users: (i) total impressions; (ii) total clicks; (iii) total gross revenue in the AdSense auction; and (iv) total amount paid to publishers.¹³ In addition, this AdSense "backfill" data will include [REDACTED]

(GOOG-AT-MDL-DATA-000482532 to GOOG-AT-MDL-DATA-000486515 (folders:

- mdl_rfp_243_adsense_backfill_2015_2018_submission
- mdl_rfp_243_adsense_backfill_2019_2023_submission)

For each month from January 2015 to December 2022, data showing: (i) total impressions served by Google Ad Manager, separately for each publisher (i.e., [REDACTED]), user location (i.e.,

⁹ In the course of collecting the data to respond to RFP 243, Google discovered that [REDACTED]

¹⁰ As noted in footnotes 2 and 6 above,

¹¹ In the course of preparing its response to RFP 243, [REDACTED]

¹² As noted in footnote 6 above,

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	(GOOG-AT-MDL-DATA-000508825 (folder: mdl_rfp_243_gam_impressions_fees_submission); GOOG-AT-MDL-DATA-000486516 to GOOG-AT-MDL-DATA-000486625 (folder: mdl_rfp_243_dfp_fees_submission))
247	Data showing, for each month between January 2014 and December 2022, the total number of U.S. user AdX web impressions won by <ul style="list-style-type: none">• Google Ads,• DV360, and• each non-Google ad buying tool purchasing through AdX (e.g., [REDACTED]). (GOOG-AT-MDL-DATA-000508826 (folder: mdl_rfp_247_submission))
296	Data from May 2020 through March 2023 showing, for each month, and for each Google Ads account ID that Plaintiffs identify as associated with each “Advertiser Plaintiff,” the number of times that account logged into Google Ads. ¹⁵ (GOOG-AT-MDL-DATA-000066536 (folder: mdl_rfp_296_submission))

Plaintiffs can access the data production described above via Microsoft Azure. Google will make this production available to the following Azure-associated email addresses, as was done with prior data productions. Please let us know if any other email addresses should be included.

- mbock@girardsharp.com
- kbriggs@kellogghansen.com
- chris@233analytics.com
- TexasOAGCaseAzureAccount@nthpc.com

The contents of this letter are confidential and Google is marking this letter Confidential consistent with the Confidentiality Order.

Regards,



David R. Pearl

¹⁴[REDACTED]

¹⁵ Google located login information for Advertiser Plaintiff [REDACTED], using two IDs provided by Plaintiffs and two additional IDs that Google identified via manual review of customer names.